

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)	
UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10045-DPW
)	
LUIS RAMIREZ, A/K/A)	
"KING LITTLE PSYCHO")	
)	

JOINT INITIAL STATUS REPORT

The United States of America and the defendant, Luis Ramirez, by their respective undersigned counsel, submit this joint status report pursuant to Local Rule 116.5(A).

1. Local Rule 116.3 Timing Requirements

At this time the parties do not seek relief from the timing requirements imposed by L.R. 116.3.

2. Expert Discovery

The government anticipates that, unless there is a stipulation regarding the controlled substances involved in this case, it will offer expert testimony regarding the cocaine and/or the cocaine base seized in this case. The defendant does not presently request expert discovery, but reserve its right to seek such discovery pending disclosure of trial witnesses by the government.

3. Additional Discovery

All Rule 16 and automatic discovery materials have been provided or made available to defendant's counsel.

4. Motion Date

The parties jointly request that all motions be filed on or before May 25, 2004, and any responses be served by June 8, 2004.

5. Speedy Trial Act

The parties have conferred on the periods excludable from all Speedy Trial Act calculations and believe that the following periods are excludable:

2/26/04-3/11/04	Arraignment and Order on Excludable Time, dated 2/26/04
3/11/04-3/25/04	Order on Excludable Time, dated 2/26/04 (see footnote 1)
4/7/04-4/13/04	Excludable delay pursuant to 18 U.S.C. § 3161(h)(8)(A)
4/13/04-date of Final status	Excluded as set forth above

As of the Final Status Conference, 12 days will have been counted and 58 days will remain under the Speedy Trial Act.

6. Anticipated Trial

It is too early to tell whether a trial will be needed in this matter. The United States estimates that a trial would last approximately 3-5 days.

7. Final Status Conference

The parties request that a Final Status Conference be scheduled for June 8, 2004, or as soon thereafter as is convenient for the Court.

Respectfully submitted,

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